



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-7452 • (206) 649-7000
OFFICE OF WASTE & CHEM. MGMT.

RECEIVED

FEB 19 2003

WA 2917

3A

2/17/03

February 17, 2003

CERTIFIED MAIL

7002 2030 0006 2248 4280

Ms. Susan Roth
6236 27th Avenue NE
Seattle, WA 98115-7114

Dear Ms. Roth:

RE: Comments on the Draft Tidal Study Report: Terminal 91 Tank Farm Site
Agreed Order No. DE 98HW-N108 and Upland Independent Cleanup.

The Draft Tidal Study Report, prepared for the Terminal 91 Site PLP Group (PLP Group) by the Port of Seattle, was received by the Department of Ecology (Ecology) on November 13, 2002. This report addresses the portion of the Port of Seattle (POS) Terminal-91 facility where RCRA corrective action is being performed pursuant to the Model Toxics Control Act (MTCA) Agreed Order No. DE 98HW-N108; and the upland Independent Cleanup that is being performed according to conditions set forth under the Voluntary Cleanup Program (VCP). The Report may be considered **Final** with the following understanding by the Department of Ecology (Ecology).

Ecology's comments:

- *There is a data gap regarding the amount of groundwater leakage through the bulkheads. This discharge/leakage may affect the water and sediment quality of Elliot Bay.*
- *Contaminant maps show reported exceedences of groundwater screening criteria in well Nos. GP-1 through GP-7 and W10. Additional fieldwork to characterize the groundwater discharge to Elliott Bay is therefore indicated.*

A PLP request for a technical reference that estimates a "bulkhead factor" for "leakage" through quay walls at the Bremerton Naval Shipyard is provided for your use at this site. It should be noted that the bulkhead factor is obtained indirectly by site-specific computer modeling at the PSNS shipyards. The reference is: *U.S. Geological Survey. 1997. Numerical*

USEPA RCRA



3012883

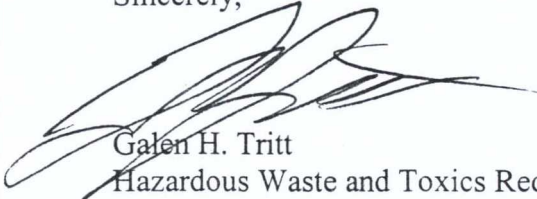
FILE COPY

Susan Roth
February 18, 2003
Page 2 of 2

Simulation of Ground-Water Flow Paths and Discharge Locations at Puget Sound Naval Shipyard, Bremerton, Washington. Open-File Report 95-361. Tacoma Washington.

Thank you for your submittal. If you have any questions or comments, please contact me at the Department of Ecology Northwest Regional Office by phone at (425) 649-7280 or by email at gtri461@ecy.wa.gov.

Sincerely,



Galen H. Tritt
Hazardous Waste and Toxics Reduction Program

GHT:sd

cc: Julie Sellick, Ecology-NWRO
Ed Jones, Ecology-NWRO
Michael Kuntz, Ecology-HQ-TCP
Jan Palumbo, EPA Region 10
HZW File 6.2